

In the Claims

Please amend claim 20 as follows:

20. The kit of claim 16 wherein the instruction manual provides a point of contact telephone number associated with the computer-readable internet service provider specific software code.

REMARKS

Changes to the specification are shown in the attached Appendix A ("VERSION WITH MARKINGS TO SHOW CHANGES MADE") with additions underlined and deletions in brackets. Claim 20 is amended because of a typographical error. It was valid as originally submitted, and it remains valid. No narrowing of the scope of the claim is intended or effected.

Claims 1-2, 5-9, 12-17, and 20 stand rejected under 35 U.S.C. §102(a), as being anticipated by "SBC global network DSL: Customer Self Install" ("Document"). Claims 3-4, 10-11, and 18-19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over the Document. Applicant respectfully requests that the rejections be withdrawn because the Document neither discloses nor suggests any of the following:

- (I) "an instruction manual which describes a unified installation process...wherein the unified installation process requires at most one operating system selection step by a user," as recited in claims 1, 8, and 16;
- (II) that "the unified installation process described within the instruction manual requires no operating system selection step by the user," as recited in claims 2, 9, and 17;
- (III) "a point of contact phone number associated with" certain kit elements: "the digital subscriber line modem," as recited in claims 5 and 13; "the at least one digital subscriber line filter," as recited in claims 6 and 14; "the computer-readable connection software code," as recited in claims 7 and 15; "the network card," as recited

- in claim 12; and, "the computer-readable internet service provider specific software code," as recited in claim 20; and,
- (IV) "a computer-readable medium whose contents comprise computer-readable connection software code," as recited in claims 1 and 8, and "at least one computer-readable medium whose contents comprise computer-readable connection software code and computer-readable internet service provider specific software code," as recited in claim 16.

The Document discloses a series of World Wide Web pages from the www.archive.org "internet archive" service. The disclosed web pages purport to have been published on the www.pacbell.com web site on August 18, 2000. The pages provide basic sales information for digital subscriber line ("DSL") service, including pricing information, ordering information, a System Requirements page, a Glossary page, a Contact page, and a "Customer Self-Install" page. The Document notes that "A single-user DSL connection requires" a "DSL modem," a "Network Interface Card (NIC)," a "Splitter," and "Inside wire" (Page 4). The "Customer Self-Install" option allows a customer to "hook up [his own] computer and modem, and then register [his] service [himself]" (Document, page 1).

With this Self-Install option, the provider supplies "instructions – and technical assistance is just a phone call away" (Document, page 1). The Document does not, however, specify the contents or format of these "instructions" in any way. The "instructions" specified do not disclose or suggest an instruction manual, a unified installation process, or what operating system selection steps are required. From the little information disclosed in the Document, the Self-Install option may—as is cautioned against by the Specification—present customers with as many as five different instruction sets, many of which being labeled "Read Me First" (Specification, page 2, lines 1-4). A user may be uncertain as to which manual to read first, and unable to identify key steps in each manual (Specification, page 2, lines 11-13). Moreover, user testing

has shown that critical installation steps are often missed with self-installation kits, such as the one described in the Document (Specification, page 2, lines 13-15).

On the other hand, independent claims 1, 8, and 16 call for "an instruction manual which describes a unified installation process...wherein the unified installation process requires at most one operating system selection step by a user." And, dependent claims 2, 9, and 17 hold that "the unified installation process described within the instruction manual requires no operating system selection step by the user." The Document makes mention of various operating systems, but it gives no guidance as to whether there is a unified installation process, how such a process might progress, or whether such a process might use one or no operating system selection steps. Therefore, for at least these reasons, Applicant respectfully requests that the rejection to claims 1, 2, 8, 9, 16, and 17 be withdrawn.

Next, the "technical assistance" mentioned by the document is a single toll-free telephone number, determined by whether a customer has residential or business service (Document, page 10). This telephone number is not associated with any equipment or media. As is noted in the Specification, "Points of contact for specific installation components may be clearly marked and associated with specific steps in the instruction manual to promote correct routing of help calls" (Specification, page 9, lines 22-25). On the contrary, the Document does not disclose or suggest associated point of contact telephone numbers or that those numbers are provided in an instruction manual (Page 10). Claims 5-7, 12-15, and 20 require that there be an instruction manual that "provides a point of contact telephone number associated with" specific kit elements recited in those claims, as noted in "(III)" above. Therefore, for at least these reasons, Applicant respectfully requests that the rejection to claims 5-7, 12-15, and 20 be withdrawn.

Finally, looking at the "System Requirements" pages, the Document notes that the customer "must have [his] computer manufacturer's Owner's Guide and


[his] computer's Operating System on installation media" (Pages 8-9). The Document does not specify any connection software code, nor does the Document mention any type of media or software code related to connection or to internet service providers. The only reference to media or software code in the Document concerns the Operating System software of the computer of the customer (Pages 8-9).

Conversely, independent claims 1 and 8 require "a computer-readable medium whose contents comprise computer-readable connection software code." Independent claim 16 requires "at least one computer-readable medium whose contents comprise computer-readable connection software code and computer-readable internet service provider specific software code." The mere mention of Operating System software does not disclose or suggest media comprising either or both of connection software code and internet service provider specific software code. Therefore, for at least these reasons, Applicant respectfully requests that the rejection to claims 1, 8, and 16 be withdrawn.

For at least these reasons, the Document neither anticipates nor makes obvious any of the claims 1-20. Applicant notes that claims 2-7, 9-15, and 17-20 depend on claims 1, 8, and 16, respectively, and thus, all arguments in favor of claims 1, 8, and 16 apply in favor of dependent claims 2-7, 9-15, and 17-20, respectively. Therefore, Applicant respectfully requests that the rejections of claims 1, 8, and 16, and their dependent claims 2-7, 9-15, and 17-20, be withdrawn.

Applicant respectfully requests reconsideration and allowance of the present application. The Examiner is invited to contact the undersigned attorney at (312) 321-4224 if there are any outstanding issues that could be resolved through a telephone conference.

Respectfully submitted,



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Appendix A
VERSION WITH MARKINGS TO SHOW CHANGES MADE

In the Claims

Please amend claim 20 as follows:

20. The kit of claim [8] 16 wherein the instruction manual provides a point of contact telephone number associated with the computer-readable internet service provider specific software code.